

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In re: Sharon V. Bacon, Debtor

Case No.: 11-26495
Chapter 7

SRMOF 2009-1 Trust)
Movant)
)
vs.)
)
Sharon V. Bacon)
Debtor)
)
and)
)
Michael G. Rinn,)
Trustee)
)
Respondent(s))
_____)

OPPOSITION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW the Debtor, Sharon Bacon, by counsel, The Aylward Law Firm LLC, and Jillian K. Aylward and hereby submits this Answer in Opposition to the Motion for Relief from Stay (the "Motion") filed by SRMOF 2009-1 Trust (the "Trust") and respectfully represents as follows:

FIRST DEFENSE

1. Paragraphs numbered 1, 2, and 3 are admitted.
2. Paragraphs numbered 5 and 7 are denied 6, 8 and 9 are denied, strict proof of the allegations contained therein is demanded.

3. The Debtor has insufficient information to admit or deny the allegations contained in paragraphs 4 and 6.

SECOND DEFENSE

4. The Debtor has a loan modification agreement with the lender and has made payments required under the agreement.
5. The Trust is not entitled to relief from the automatic stay.
6. The Debtor has made payments to the Trust over the last few months under a modification agreement and the Trust or lender continues to accept payments from the Debtor.

WHEREFORE, the Respondent respectfully requests that this Court deny the Trust's Motion to Lift the Stay; and grant such other and further relief as is just and proper.

Sharon Bacon

By her attorney,

/s/ Jillian K. Aylward

Jillian K. Aylward (17613)

Attorney at Law

The Aylward Law Firm LLC

17 W. Jefferson St. #100

Rockville, Maryland 20850

jillian@aylwardbankruptcyfirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Answer in Opposition to Accredited Home Lenders, Inc. Motion for Relief from Stay was sent electronically by ECF mail or was mailed first-class mail, postage pre-paid this 7th day of September 2011, to:

Jeffrey Nadel
4041 Powder Mill Road, Suite 415
Calverton, Maryland 20705

Attorney for Movant

Michael G. Rinn
111 Warren Road
Suite 4
Cockeysville, MD 21030

/s/ Jillian K. Aylward
Jillian K. Aylward